

Fitchburg Gas and Electric Light Company
Comments on Low-Income Discount Rate Program

Outreach and Eligibility Plan

November 20, 2000

INTRODUCTION

Customers of Fitchburg Gas and Electric Light Company who are at or below 175% of the poverty level (\$28,087 or less for a family of four) are entitled to receive a discounted rate on gas and/or electric service. To assure that the maximum number of qualifying customers participate, FG&E has developed an outreach and eligibility plan. This plan is monitored by the Division of Energy Resources (DOER).

OUTREACH

The Company's audience is FG&E customers with incomes at or below 175% of the poverty level. FG&E's outreach communications describe the Low-Income discount rate program and provide a checklist of qualifications. Those who qualify will be directed to contact the Company's customer service department to apply. Listed below are the methods used to reach the target audience:

BILL INSERTS

Each February, May, August and October, the Company prints an article in the customer newsletter on the Low-Income discount rate program. This reaches approximately 31,000 FG&E customers.

The newsletter also publishes articles on our Budget Billing Program, Energy Efficiency Program and how to contribute and apply for the Good Neighbor Energy Fund. This fund provides fuel assistance to those who don't qualify for other fuel assistance programs. FG&E also has a monthly column on Energy Saving Tips. Customer surveys indicate positive response to these articles. The Good Neighbor Energy Fund envelopes are mailed to all customers twice each year.

CUSTOMER SERVICE TRAINING

All FG&E customer service personnel are fully trained on the Company's Low-Income discount rate program. This occurs as part of the 4 week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A review training session on the Low-Income discount rate program is held as needed, at a minimum twice each year.

OTHER COLLATERAL

FG&E produces and distributes a brochure/application on the Low-Income discount rate program. This brochure is displayed at the Company's walk in payment center in Fitchburg.

Also, beginning in January, 2001, during the winter moratorium months, FG&E will be sending information to all residential customers who are not on the Low-Income discounted rate who may be having difficulty paying their bills. The information will

include a list of social service agencies and telephone numbers. Also included are payment plan information and text urging the customer to call us for assistance.

For customers in protected status such as elderly, medical, etc., FG&E will be implementing a program beginning in the first quarter of 2001 for communicating with these customers on a quarterly basis. These communications will provide social service information and discuss payment options such as payment plans and budget billing.

AGENCY COLLABORATION

FG&E is collaborating with welfare agencies to reach customers who are eligible for the Low-Income discount rate program. This includes providing point of purchase material for agency client education and meeting with agencies and providing fact sheets and applications. Point of purchase materials are available at our walk-in payment center in Fitchburg.

The Company reaches out to Low-Income customers through more general communications it has with its customers. These communications, described below, are intended to keep all customers, including Low-Income, informed about their energy costs and rate information.

RATE CHANGE NOTIFICATIONS

A multi-pronged approach is used to disseminate information on proposed as well as approved rate changes. Press releases are issued at the time of rate filings indicating typical bill impacts and the date of the proposed increases. The Company also notifies community, political and business leaders with the information for their feedback.

As appropriate, FG&E collaborates with the other utilities on bill insert notifications. These inserts receive final approval from the DTE. The Company also flags the rate increase on the customer bills with a bill message.

AMBASSADOR PROGRAM

Unitil has developed a stakeholder management program which identifies key community and business leaders and matches them with a Unitil contact person. These relationships allow for strong dialogue and information flow on a variety of issues including rates, reliability, operations, growth and other relevant topics. The Company is expanding this program to include more rate-focused information dissemination and discussion.